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Nevada Bar No.: 4703
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Attorney for Plaintiff

5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 HELEN BRENNAN, individually
9 Plaintiff,

10 vs.

11 STATE OF NEVADA ex rel LAS VEGAS
METROPOLITAN POLICE
12 DEPARTMENT, a political subdivision of
the State of Nevada; STATE OF NEVADA
13 ex rel NEVADA HIGHWAY PATROL, a
political subdivision of the State of Nevada;
14 TROOPER L. McCOLL, P#352, an
individual employed by STATE OF
15 NEVADA ex rel NEVADA HIGHWAY
PATROL, a political subdivision of the State
of Nevada; DOE TROOPERS I through XX,
16 employed by STATE OF NEVADA ex rel
NEVADA HIGHWAY PATROL, a political
17 subdivision of the State of Nevada; DOE
OFFICERS I through XX, employed by
18 STATE OF NEVADA ex rel ex rel LAS
VEGAS METROPOLITAN POLICE
19 DEPARTMENT, a political subdivision of
the State of Nevada; DOES I through X; and
20 ROE Business Entities I through X;
inclusive,
21 Defendants.

CASE NO.: 2: 20-cv-00662-RFB-DJA

STIPULATION AND PROPOSED
ORDER TO EXTEND THE TIME IN
WHICH THE PLAINTIFF MAY
RESPOND TO DEFENDANTS LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT'S MOTION FOR
PARTIAL SUMMARY JUDGMENT ON
PLAINTIFF'S MONELL CLAIM

(SECOND REQUEST)

22
23 Plaintiff, HELEN BRENNAN and Defendants LAS VEGAS METROPOLITAN
24 POLICE DEPARTMENT, by and through their respective counsel, hereby stipulate and agree as
25 follows:

26
27 1. On May 21, 2021, Defendant, LAS VEGAS METROPOLITAN POLICE
28 DEPARTMENT filed Defendants Las Vegas Metropolitan Police Department's Motion For

Partial Summary Judgment On Plaintiff's Monell Claim, District of Nevada, designated Case No.,:
2: 20-cv-00662-RFB-DJA, ECF No. 36.

2. On, June 4, 2021, the court granted an extension for a response to be filed by June 25, 2021.

3. The Plaintiff requests an additional day to file their response by June 28, 2021 due to computer issues with the specific draft for this response.

4. This is the second request for an extension regarding the filing of Plaintiffs response to Defendant's Motion for Partial Summary Judgment, which is made in good faith, not for the purposes of delay, and neither party is prejudiced by the short extension.

DATED this 25th day of June, 2021.

DATED this 25th day of June, 2021.

MUELLER & ASSOCIATES, INC.

KAEMPFER CROWELL

/s/ Craig A. Mueller, Esq.

/s/ Ryan W. Daniels, Esq.

CRAIG A. MUELLER, ESQ.

RYAN W. DANIELS, ESQ.

Nevada Bar No. 4703

Nevada Bar No. 13094

808 South Seventh Street

1980 Festival Plaza Drive, Suite 650

Las Vegas, NV 89101


Las Vegas, NV 89135

Attorney for Plaintiff

*Attorney for Las Vegas Metropolitan
Police Department*

IT IS SO ORDERED.

DATED this 28th day of June, 2021.


RICHARD E. BOULWARE, II
United States District Court

From: [Ryan Daniels](#)
To: [Susie Ward](#)
Cc: [Lyssa Anderson](#); [Charles Lobello](#)
Subject: RE: Stipulation
Date: Friday, June 25, 2021 5:01:00 PM

You have my permission to use my electronic signature.

KAEMPFER

CROWELL

Ryan W. Daniels
Kaempfer Crowell
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135-2958
Tel: (702) 792-7000
Fax: (702) 796-7181
Email: rdaniels@kcnvlaw.com

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From: Susie Ward [<mailto:Susie@craigmuellerlaw.com>]
Sent: Friday, June 25, 2021 4:57 PM
To: Ryan Daniels
Cc: Lyssa Anderson; Charles Lobello
Subject: FW: Stipulation
Importance: High

Attached is the stipulation and order we discussed thank you.

Sincerely,

Susie Ward

Paralegal,

Mueller and Associates

808 S. 7th Street

Las Vegas, NV 89101

P- 702-382-1200

F- 702-637-4817

susie@craigmuellerlaw.com

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From: Susie Ward

Sent: Friday, June 25, 2021 4:52 PM

To: Lyssa Anderson <landerson@kcnvlaw.com>

Cc: Charles Lobello <charles@craigmuellerlaw.com>

Subject: Stipulation

Importance: High

The attorney that drafted the response to your MSJ is having trouble getting the document to me.
Can we have till Monday??

Sincerely,

Susie Ward

Paralegal,

Mueller and Associates

808 S. 7th Street

Las Vegas, NV 89101

P- 702-382-1200

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susie@craigmuellerlaw.com

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